

**REMARKS/ARGUMENTS**

Claims 1-37 are pending in this application, of which claims 1 and 14 are independent. Claims 1, 6, and 14 have been amended. The amendments and new claims add no new matter and find full support in the application as originally filed. In view of the above amendments and following remarks, Applicant respectfully requests reconsideration and a timely indication of allowance.

**Drawings**

The Examiner has objected to the drawings, stating that "reference character "38" and reference character "41" have been used to designate both a circle and a device", "the third pipeline device as recited in claim 25 must be shown or the features canceled from the claim", and "reference signs 33 and 34 mentioned in the description are not shown".

Applicant has amended the specification to delete the spurious references to elements "38" and "41", thereby obviating this objection. Applicants have further amended the specification to remove the references to elements "33" and "34," not present in the drawings, and have amended both the specification and Figures 6 to 11 to add a reference to the "third pipehandling device," element "51", thereby obviating these objections as well.

Accordingly, Applicant respectfully requests that the objections to the drawings be withdrawn.

**Specification**

The Examiner has objected to the specification, stating that "the abstract of the disclosure has been constructed of a single, run-on sentence instead of a narrative paragraph." Applicant has amended the specification to conform with U.S.P.T.O. practice, thereby obviating this rejection.

Accordingly, Applicant respectfully requests that the objection to the specification be withdrawn.

**Claim Objections**

The Examiner objected to claims 6 and 14 based on the lack of antecedent basis. Applicant has amended both of these claims as suggested by the Examiner, thereby obviating these objection.

Accordingly, Applicant respectfully requests that the objections to the claims be withdrawn.

**Rejections Under 35 U.S.C. § 102(b)**

The Examiner has rejected claims 1-11, 13-34 and 37 under 35 U.S.C. § 102(b) as allegedly being anticipated by Lund (U.S. Patent No. 4,850,439). Applicant respectfully traverses this rejection.

Independent claims 1 and 14, upon which the remaining claims rely are directed to pipehandling systems "where the first and second pipehandling devices are disposed to allow the direct exchange of tubular lengths therebetween." This feature of the invention is extensively discussed throughout the specification, both in discussing the apparatus itself, and in discussing the off-line standbuilding method. (See, for example, Specification, page 3, lines 21-25 and page 10, lines 16-22.)

In contrast, Lund is principally directed to a single multi-role pipehandling device capable of manipulating lengths of pipe between a preparation opening, a drilling opening and a storage area. (See, e.g., col. 6, lines 3-17.) In the single, non-preferred embodiment in which two separate transport mechanisms are discussed it is clear that Lund does not contemplate a direct exchange of tubular lengths between the two mechanisms, disclosing instead "a first transporting means for transporting tubular body sections between the storage area and said first hoist," and "second transporting means for transporting tubular body sections between the storage area and said second hoist." Nowhere does Lund, disclose, teach, or even suggest a set of transport mechanism that would act in cooperation to build, exchange, and store tubular body section and lengths as disclosed by Applicant. Consequently, Lund does not anticipate either claims 1 or 14, nor by extension does Lund anticipate claims 2 to 13 and 15 to 37, which depend thereon.

Accordingly, Applicant respectfully requests that the rejection of claims 1 to 11, 13 to 34, and 37 over Lund under 35 U.S.C. § 102(b) be withdrawn.

**Rejections Under 35 U.S.C. § 103(a)**

The Examiner has rejected claims 12, 35, and 36 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lund (U.S. Patent No. 4,850,439) in view of Berry (U.S. Patent No. 5,107,940). Applicant respectfully traverses this rejection.

As discussed above, claims 1 and 14, upon which claims 12, 35, and 36 depend, are directed to pipehandling systems "where the first and second pipehandling devices are disposed to allow the direct exchange of tubular lengths therebetween." Lund does

Appln No. 10/734,923

Reply to Office action of October 8, 2004

not disclose such a "direct exchange" capability for disclosed pipehandling system, nor does Berry address Lund's deficiency, being directed to a "top drive torque restraint system," that does not even contemplate multiple pipehandling devices.

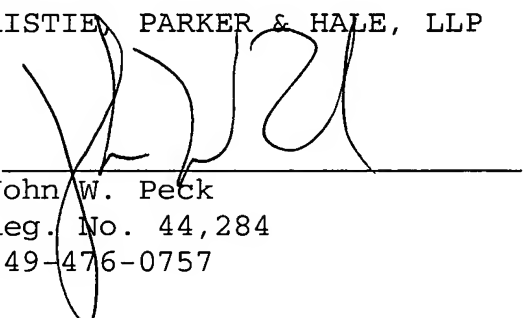
As a result, Lund and berry either alone or in combination, do not teach the pipehandling system proposed by Applicant. As such Lund and Berry do not render claims 1 or 14 obvious. Claim 12 depends from claim 1, and claims 35 and 36 depend from claim 14. Claims 1 and 14 are now believed to be in condition for allowance over Lund and Berry. As such, Applicant submits that claims 12, 35 and 36 are also allowable over Lund and Berry as being dependent from an allowable base claim and for the additional limitations they contain therein. Accordingly, Applicant respectfully requests that the rejection of claims over Lund and Berry under 35 U.S.C. § 103(a) be withdrawn.

In view of the above amendments and remarks, Applicant respectfully submits that claims 1 to 37 are in condition for allowance, and a timely indication of allowance is respectfully requested. If there are any remaining issues that can be addressed by telephone, Applicant invites the Examiner to contact the undersigned at the number indicated.

Respectfully submitted,

CHRISTIE PARKER & HALE, LLP

By

  
John W. Peck

Reg. No. 44,284

949-476-0757

JWP/jwp

TXT PAS593447.1-\* -03/3/05 8:36 AM

Appln No. 10/734,923

Reply to Office action of October 8, 2004

**Amendments to the Drawings:**

The attached sheets of drawings include changes to Figures 6 to 11. These sheets, which include Figs. 6 to 11, replaces the original sheets including Figs. 6 to 11.

Attachment: Replacement Sheets

Annotated Sheets Showing Changes

